



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

RESPONSIVENESS SUMMARY

For

Air Quality Control Permit Number 1000161

Issued To

El Paso Natural Gas Company, Willcox Compressor Station

Begin Public Notice : September 17, 1997

End Public Notice : October 18, 1997

All of the following comments were submitted by El Paso Natural Gas Company.

TABLE 1 : Summary of Permit Requirements

Comment 1: SOx Monitoring/Recordkeeping - The "< 0.017 wt% (5gr/scf) should be replaced with "0.8 percent by weight" since the sulfur dioxide standard in R18-2-719.J references 0.8 weight percent.

Response: The table has been updated to reflect this change. This change also makes the table consistent with the statements in permit condition II.A.1 of Attachment "B".

Comment 2: NOx, CO, VOC, HAPs Monitoring/Recordkeeping - The language should be revised to match other Class I Permits as follows:

Dates of turbine operation until the required performance testing is triggered.

Response: The table has been updated to reflect this change.

Comment 3: NOx, CO, VOC, HAPs Reporting - The language should be revised to match other Class I permits as follows:

-Semi-annual reports of dates of operation until the performance test is triggered

-Status of testing requirements until performance test is completed.

Response: The table has been updated to reflect this change.

Comment 4: NOx, CO, VOC, HAPs Testing frequency/Methods - The language should be revised to state as follows:

One time for NOx and CO on each turbine within 6 months of permit expiration if turbines are operated for 15 cumulative days using Method 20 and 10.

Response: The table has been modified to reflect this change.

Comment 5: *F4. Mobile Sources Monitoring/Recordkeeping - The language should read as follows:*

Record of all emissions related maintenance activities performed on Permittee's off-road machinery utilized within the station property line.

Record of all emissions related maintenance activities performed on Permittee's roadway and site cleaning machinery utilized within the station property line.

Response: The table has been modified to reflect this change.

ATTACHMENT A

Comment 1: *II. Compliance with permit conditions:*

A. The first sentence of this provision should be reworded to conform to the permit shield provisions of R18-2-325:

The Permittee shall comply with all conditions of this permit, which sets forth all applicable requirements of Arizona's air quality statutes and their air quality.

The existing language could be read as requiring the Permittee to comply with "all applicable requirements" which contradicts the purpose of a Class I permit.

Response: This change has been made.

Comment 2: *EPNG understands that normal rated capacity means capacity reflecting ambient temperature, pressure and humidity conditions present during the emissions test. EPNG also understands that ADEQ's inclusion of the provision allowing for performance testing at lower operational rates with the Director's prior written approval acknowledges that at certain times there may be insufficient natural gas throughput to operate at "normal rated capacity" in which case testing may be deferred or conducted at a lower operating rate. While EPNG would prefer that ADEQ include permit language defining normal rated capacity as capacity reflecting ambient conditions and available pipeline capacity, EPNG is willing to accept ADEQ's explanation of its intent in the Technical Review Document and response to these comments.*

Response: EPNG has demonstrated - through the application, past performance records and discussions - that the Willcox station is operated on an intermittent basis in response to natural gas demands. ADEQ is aware that EPNG may or may not operate the engine(s) at their normal rated capacity, during the life of the permit. Given the unpredictability in operations, it was decided that the optimal course of action would be to obtain written approval from the Director at the time of testing, if the testing is to be performed at a lower rate. This comment does not result in a change in the permit language.

ATTACHMENT B

Comment 1: *Emissions Limitations (I.B.1.b.3)*

EPNG understands that dust suppressants or wetting agents are to be used during construction operations, repair operations, and demolition activities directly associated with earth moving or excavation activities likely to generate excessive amounts of particulate matter and not for any

construction operation, repair operation, or demolition activity. EPNG requests ADEQ clarification if this is not ADEQ's intent.

Response: The intent of condition I.B.1.b.3 of Attachment "B" of the permit is to regulate excessive emissions of particulate matter. The intent of this condition is further clarified by the wording of condition I.B.1.b which is as follows: "Permittee shall employ the following methods to *prevent excessive amounts of particulate matter from becoming airborne*:". Those construction, repair, or demolition operations that have no associated particulate matter emissions are not subject to the requirements of condition I.B.1.b.3 of Attachment "B" of the permit. This comment does not result in a change in the permit language.

Comment 2: Emissions Limitations

On occasion, EPNG personnel will need service air conditioners at remote compressor stations. Therefore, we need to add #5. When contracting air conditioner maintenance service, the contractor will ensure that requirements of 40 CFR 82-Subpart F are met. Since some parts of Subpart F are applicable only to manufacturers or importers of recycling equipment or other particular situations, the language below notes that only "applicable" requirements must be met by EPNG.

5. Nonvehicle Air Conditioner Maintenance and/or Services

When Permittee's employees are servicing applicable appliances, the permittee shall comply with applicable requirements of 40 CFR 82- Subpart F.

Response: A condition to this effect has been added in I.C.5 in Attachment "B" of the permit.

Comment 3: Monitoring and Recordkeeping (II.A.1)

EPNG understands that we need to maintain an updated copy of the extracted portion of the FERC approved tariff which pertains to the sulfur content and lower heating value of the fuel and not the entire FERC tariff which is a voluminous and periodically edited document. EPNG requests ADEQ clarification if this is not ADEQ's intent.

Response: The intent of condition II.A.1 of Attachment "B" of the permit is to monitor particulate and sulfur dioxide emission standards only. The language has been modified to further clarify that tariff information relating only to lower heating value and fuel sulfur content needs to be kept on file. The modified language is reproduced below:

Permittee shall monitor daily, the sulfur content and lower heating value of the fuel being combusted in the gas turbines. This requirement may be complied with by maintaining a copy of **that part of** the Federal Energy Regulatory Commission (FERC) approved Tariff agreement that limits transmission to pipeline quality natural gas of sulfur content less than 0.8 percent by weight and having a heating value greater than or equal to 967 Btu/ft³.

Comment 4: Monitoring and Recordkeeping (II.A.2)

EPNG requests that the language be modified to match other Class I permits as follows:

2. Permittee shall record the dates of operation of each one of the natural gas turbines

This information shall be recorded until such time when the fifteen cumulative days are triggered for conducting a performance test.

Response: This change has been made.

Comment 5: *Monitoring and Recordkeeping (II.B.1)*

For a more streamlined permit, EPNG suggests that ADEQ consider combining the identical provisions of II.B.1.c through II.B.1.i. EPNG proposes

c. Dates on which any of the activities listed in I.B.1.b.(3) through (9) were performed, and control measured adopted.

Response: The current format of condition II.B.1 of Attachment “B” of the permit will be retained.

Comment 6: *Monitoring and Recordkeeping (II.C.1)*

A record of the abrasive blasting project requires a log in ink. EPNG requests that “in ink” be removed since it implies that a handwritten rather than a printed electronic log must be kept. Many other agencies such as DOT and Arizona Corporation Commission accept electronic recordkeeping. Since EPNG must comply with the every 6 month compliance certification, it is our duty to assure that the records are accurate and complete.

Response: The language of condition II.C.1 of Attachment “B” of the permit has been modified as follows:

“Each time an abrasive blasting project is conducted, the Permittee shall log in ink **or in an electronic format**, a record of the following:....”

Comment 7: *Monitoring and Recordkeeping (II.C.2)*

A record of the spray painting project requires a log in ink. EPNG requests that “in ink” be removed since it implies that a handwritten rather than a printed electronic log must be kept. Many other agencies such as DOT and Arizona Corporation Commission accept electronic recordkeeping. Since EPNG must comply with the every 6 month compliance certification, it is our duty to assure that the records are accurate and complete.

Response: The language of condition II.C.1 of Attachment “B” of the permit has been modified as follows:

“Each time an spray painting project is conducted, the Permittee shall log in ink **or in an electronic format**, a record of the following:....”

Comment 8: *Monitoring and Recordkeeping (II.C.3)*

EPNG continues to assert that there is no strict correlation between maintenance activities and exceeding the 40 % opacity standard for mobile sources. EPNG has mobile sources located in El Paso, Gallup, and other locations within the EPNG system. The current permit language requires a record of maintenance activities of Permittee’s equipment. “Permittee’s equipment” could mean equipment stationed in El Paso or other EPNG locations that would never be used at the permitted facility. Therefore, EPNG requests that the permit language be revised as follows:

The Permittee shall keep a record of all emissions related maintenance activities performed on Permittee's mobile sources utilized within the station property line as per manufacturer's specifications.

Response: This change has been made.

Comment 9: *On occasion, EPNG personnel will need service air conditioners at remote compressor stations. Therefore, we need to Add #5. When contracting air conditioner maintenance service, the contractor will ensure that requirements of 40 CFR 82-Subpart F are met. Since some parts of Subpart F are applicable only to manufacturers or importers of recycling equipment or other particular situations, the language below notes that only "applicable" requirements must be met by EPNG.*

5. Nonvehicle Air Conditioner Maintenance and/or Services

As a means of demonstrating compliance with condition I.C.5 of this Attachment, the Permittee shall keep a record of all relevant paperwork of 40 CFR Part 82-Subpart F applicable requirements on file.

Response: A condition to this effect has been added in II.C.5 of Attachment "B" of this permit.

Comment 10: *Monitoring and Recordkeeping (II.D)*

EPNG understands that a log of all records does not preclude the use of a three ring binder or centralized file folders. EPNG requests ADEQ clarification if this is not ADEQ's intent.

Response: ADEQ agrees with EPNG that a log of all records does not preclude the use of a three ring binder or centralized file folders.

Comment 11: *Reporting Requirements (III.B)*

EPNG requests that the language be revised to match other Class I permits as follows:

1. *Permittee shall report the dates of operation for each one of the natural gas fired units.*

This information shall be reported until such time when the fifteen cumulative days are triggered for conducting a performance test.

2. *Until a performance test pursuant to Section IV.A of this attachment is completed, Permittee shall report the status of the testing requirement.*

Response: The language has been revised as requested.

Comment 12: *Testing Requirements (A.1)*

EPNG agrees with the Technical Review Document that there are no emission limits or standards for NOx and CO for the units at the facility. EPNG does not believe that R18-2-719 or any other applicable requirement establishes NOx and CO emissions standards applicable to the station. Although EPNG believes there is no basis for NOx and CO testing requirements, EPNG does, however, understand ADEQ's intent in providing corroborating data to supplement the existing

emissions estimates. By agreeing to this one-time test, EPNG is not conceding that any such testing is required.

Response: EPNG's stance on this issue has been noted.

Comment 13: *Testing Requirements (A.1)*

At some EPNG locations, there is a high pressure pipeline system and low pressure pipeline system that is distinct and each system is connected to only one particular turbine unit. Therefore, if there is no means of routing the natural gas between the systems, one unit may operate while the other may not. Since the intent of the requirement is to mandate testing of a particular unit, the fifteen cumulative days should be unit specific rather than location specific. The requirement to conduct a performance test on the GE if the cumulative days of operation of all engines during the permit term exceed fifteen days should be changed to read as follows:

Permittee shall conduct performance tests on the General Electric turbine engine if the cumulative days of operations of the unit during the permit term exceed fifteen days.

Response: The language has been modified to read as follows:

"Permittee shall conduct one performance test on a turbine if the cumulative days of operation of the unit during the permit term exceed fifteen days."

ATTACHMENT C

Comment 1: *EPNG requests that the following additional item be added to the list of "requirements specifically identified as applicable":*

40 CFR 82 - Protection of Stratospheric Ozone - Subpart F - Recycling and Emissions Reduction

Response: This item has been added to the relevant list in Attachment C of the permit.

Comment 2: *EPNG requests that the following additional item be added to the list of "requirements specifically identified as not applicable":*

R18-2-901.39 - New Source Performance Standard - Stationary Gas Turbines

Response: This item has been added to the relevant list in Attachment C of the permit.

ATTACHMENT D

Comment 1: *The Date of Manufacture in the table should be changed to "Date of Installation/Date of Manufacturer" since the manufacture date is unknown.*

Response: The column heading has been changed to Date of Manufacture/Installation.

ATTACHMENT E

Comment 1: *The list of insignificant activities includes item 33 "Caterpillar model 585 KW generator, used only for emergency purposes". Item 33 should be removed since Item 1 addresses generators used only for emergency replacement or standby service.*

Response: Item 33 has been removed from the list in Attachment "E". Item 1 has been modified to read as follows:

Internal combustion (IC) engine-driven compressors, IC engine-driven electrical generator sets used only for emergency replacement or standby service (including Caterpillar model 585 kW generator, used only for emergency purposes).